

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

Cr. No. H-21-350

**CLARENCE CHRISTOPHER CHAMBERS
ASIA MONAE HAILEY**

UNOPPOSED JOINT MOTION FOR CONTINUANCE

The Defendants moves this Honorable Court for a 90-day continuance of the motions deadline, pretrial conference and trial, and respectfully shows as follows:

The indictment charges defendants with sex trafficking conspiracy in violation of 18 U.S.C. § 1594. The pretrial motions deadline is January 31, 2025, the pretrial conference is set for March 3, 2025, and trial is set for March 10, 2025.

Counsel for defendants need more time to review discovery in this case and investigate any legal and factual issues they identify. Counsel also need time to discuss the case with their respective clients. A continuance is appropriate under these circumstances to allow the Defendants the reasonable time necessary for effective preparation.

The defendants respectfully submits that the best interests of justice served by granting this motion for a continuance substantially outweigh the interests of the defendant and the community in a speedy trial, and that failure to grant the continuance would deprive defense counsel of sufficient time to prepare for trial.

The Government is unopposed to this Joint Motion for Continuance.

Respectfully submitted,

PHILIP G. GALLAGHER
Federal Public Defender
Southern District of Texas No. 566458
New Jersey State Bar No. 2320341

By /s/ Alex Rosa-Ambert
ALEX ROSA-AMBERT
Assistant Federal Public Defender
Attorney-in-Charge
Puerto Rico State Bar ID No. 15048
Southern District of Texas No. 3644073
Attorneys for Defendant
440 Louisiana, Suite 1350
Houston, Texas 77002-1056
Telephone: 713.718.4600
Fax: 713.718.4610

CERTIFICATE OF CONFERENCE

I certify that I conferred with Assistant United States Attorney Eun Suh and determined that the United States is unopposed to this Joint Motion for Continuance.

I also certify that I conferred with Mr. Andrew Williams, who represents Asia Hailey, and he joins in this motion.

s/ Alex Rosa-Ambert
ALEX ROSA-AMBERT

CERTIFICATE OF SERVICE

I certify that on January 27, 2025, a copy of the foregoing was served by Notification of Electronic Filing to all parties of record.

s/ Alex Rosa-Ambert
ALEX ROSA-AMBERT